1	Cyrus Safa Attorney at Law: 13241			
2	Law Offices of Lawrence D. Rohlfing 12631 East Imperial Highway, Suite C-115 Santa Fe Springs, CA 90670 Tel.: (562) 868-5886			
3				
4	Fax: (562) 868-5491 E-mail: rohlfing.office@rohlfinglaw.com			
5		1		
6	Gerald M. Welt Attorney at Law: 1575 732 S. Sixth Street, Suite 200-D			
7	Las Vegas, NV 89101			
8	Tel.: (702) 382-2030 Fax: (702) 684-5157			
9	E-mail: gmwesq@weltlaw.com; kwp@w	veltlaw.com		
	Attorneys for Plaintiff Manuel L. Garcia			
10				
11	UNITED STATES DISTRICT COURT			
12	DISTRICT	OF NEVADA		
13	MANUEL L. GARCIA,) Case No.: 2:18-cv-02226-JCM-GWF		
14	MANUEL L. GARCIA,			
15	Plaintiff,) STIPULATION TO EXTEND TIME) OF TIME TO FILE MOTION FOR) REMAND/REVERSAL		
16	VS.)) (FIRST REQUEST)		
17	NANCY A. BERRYHILL, Acting Commissioner of Social Security,) (TRST REQUEST)		
18))		
19	Defendant.))		
20				
21	Plaintiff Manuel L. Garcia and De	fendant Nancy A. Berryhill, Acting		
22	Commissioner of Social Security, throug	h their undersigned attorneys, stipulate,		
	subject to this court's approval, to extend	I the time from May 2, 2019, to May 31,		
23	2019, for Plaintiff to send his Motion for Remand/Reversal with all other dates in			
24	the Court's Scheduling Order extended a	ccordingly. This is Plaintiff's first request		
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26				

1	for an extension. This request is made at the request of Plaintiff's counsel to allow	
2	additional time to fully research the issues presented.	
3	Plaintiff's counsel currently has three motions due the week this motion is	
4	due. Counsel has at least one District Court motion due each week until May 31,	
5	in addition to it seven reply briefs, and 11 Appeals Council briefs. Council will	
6	also be taking a pre-planned leave one-week prior to the proposed due date. Also,	
7	in May, plaintiff's counsel also has three out of county hearings requiring	
8	significant travel time. An extension to May 31, 2019, will allow counsel to fully	
9	research the issues presented.	
10	DATE: April 26, 2019 Respectfully submitted,	
11	LAW OFFICES OF LAWRENCE D. ROHLFING	
12	/s// Cyrus Safa	
13	/s/ / Cyrus Safa BY: Cyrus Safa	
14	Attorney for plaintiff Manuel L. Garcia	
15 16	DATE: April 26, 2019 NICHOLAS A. TRUTANICH United States Attorney	
17	Officed States 7 Morney	
18	/s/ Gina Tomaselli	
19	BY:	
20	Gina Tomaselli Special Assistant United States Attorney	
21	Attorneys for defendant Nancy A. Berryhill Acting Commissioner of Social Security	
22	*authorized by e-mail	
23		
24	DATED:	
25	IT IS SO ORDERED:	
26	UNITED STATES MAGISTRATE JUDGE	

CERTIFICATE OF SERVICE FOR CASE NUMBER 2:18-CV-02226-JCM-GWF I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on April 26, 2019. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system. /// Cyrus Safa Cyrus Safa Attorneys for Plaintiff Attorneys for Plaintiff 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26			
FOR CASE NUMBER 2:18-CV-02226-JCM-GWF I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on April 26, 2019. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system. /// Cyrus Safa Cyrus Safa Attorneys for Plaintiff Cyrus Safa Attorneys for Plaintiff 12 13 14 15 16 17 18 19 20 21 22 23 24 25	1		
I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on April 26, 2019. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system. //s/ Cyrus Safa Cyrus Safa Attorneys for Plaintiff Cyrus Safa Attorneys for Plaintiff 20 21 22 23 24 25	2	CERTIFICATE OF SERVICE	
Court for this court by using the CM/ECF system on April 26, 2019. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system. /s/ Cyrus Safa Cyrus Safa Attorneys for Plaintiff Attorneys for Plaintiff 12 13 14 15 16 17 18 19 20 21 22 23 24 25	3	FUR CASE NUMBER 2:10-C V-U2220-JCMI-G VVF	
I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system. /s/ Cyrus Safa Cyrus Safa Attorneys for Plaintiff Cyrus Safa Attorneys for Plaintiff Reliable Safa Safa Safa Safa Safa Safa Safa Saf	4	I hereby certify that I electronically filed the foregoing with the Clerk of the	
that service will be accomplished by the CM/ECF system. //s/ Cyrus Safa Cyrus Safa Attorneys for Plaintiff 12 13 14 15 16 17 18 19 20 21 22 23 24 25	5	Court for this court by using the CM/ECF system on April 26, 2019.	
that service will be accomplished by the CM/ECF system. /s/ Cyrus Safa Cyrus Safa Attorneys for Plaintiff 12 13 14 15 16 17 18 19 20 21 22 23 24 25	6	I certify that all participants in the case are registered CM/ECF users and	
9	7	that service will be accomplished by the CM/ECF system.	
Cyrus Safa Attorneys for Plaintiff 20 21 22 23 24 25	8	/u/ Commer CorCo	
Attorneys for Plaintiff Attorneys for Plaintiff Attorneys for Plaintiff Attorneys for Plaintiff 12 13 14 15 16 17 18 19 20 21 22 23 24 25	9	/s/ Cyrus Saja 	
11	10	Cyrus Safa	
13 14 15 16 17 18 19 20 21 22 23 24 25	11	Attorneys for Plaintiff	
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1	Cyrus Safa	
2	Attorney at Law: 13241 Law Offices of Lawrence D. Rohlfing	1.7
3	12631 East Imperial Highway, Suite C-1 Santa Fe Springs, CA 90670	15
4	Tel.: (562) 868-5886 Fax: (562) 868-5491	
5	E-mail: rohlfing.office@rohlfinglaw.con	1
6	Gerald M. Welt Attorney at Law: 1575	
7	732 S. Šixth Street, Suite 200-D Las Vegas, NV 89101	
8	Tel.: (702) 382-2030 Fax: (702) 684-5157 E-mail: gmwesq@weltlaw.com; kwp@w	veltlaw com
9	Attorneys for Plaintiff Manuel L. Garcia	
10	Attorneys for Flamini Wander L. Garcia	
11		
12	UNITED STATES	DISTRICT COURT
13		OF NEVADA
14		
15	MANUEL L. GARCIA) Case No.: 2:18-cv-02226-JCM-GWF
16	Plaintiff,) PROPOSED ORDER EXTENDING
17	v.	
10	**) BRIEFING SCHEDULE
18	NANCY A. BERRYHILL, Acting) BRIEFING SCHEDULE))
19) BRIEFING SCHEDULE))))
	NANCY A. BERRYHILL, Acting) BRIEFING SCHEDULE))))))
19	NANCY A. BERRYHILL, Acting Commissioner of Social Security,) BRIEFING SCHEDULE)))))))
19 20	NANCY A. BERRYHILL, Acting Commissioner of Social Security,	
19 20 21	NANCY A. BERRYHILL, Acting Commissioner of Social Security, Defendant. Based upon the stipulation of the part of	
19 20 21 22	NANCY A. BERRYHILL, Acting Commissioner of Social Security, Defendant. Based upon the stipulation of the part of	oarties, and for cause shown,
19 20 21 22 23	NANCY A. BERRYHILL, Acting Commissioner of Social Security, Defendant. Based upon the stipulation of the part of	oarties, and for cause shown, Plaintiff shall have an extension of time, to le Plaintiff's MOTION FOR REVERSAL
19 20 21 22 23 24	NANCY A. BERRYHILL, Acting Commissioner of Social Security, Defendant. Based upon the stipulation of the part of	oarties, and for cause shown, Plaintiff shall have an extension of time, to le Plaintiff's MOTION FOR REVERSAL

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1	Case Management Order shall be extended accordingly. IT IS SO ORDERED.
2	DATE: 4/30/2019
3	THE HONORABLE GEORGE FOLEY UNITED STATES MAGISTRATE JUDGE
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